

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CITY OF HUNTINGTON,
Plaintiff,

v.
AMERISOURCE BERGEN DRUG
CORPORATION, et al.,
Defendants.

Civil Action No. 3:17-cv-01362

CABELL COUNTY COMMISSION,
Plaintiff,

v.
AMERISOURCE BERGEN DRUG
CORPORATION, et al.,
Defendants.

Consolidated case:
Civil Action No. 3:17-cv-01665

STIPULATION REGARDING AUTHENTICITY OF IQVIA DATA

The Plaintiffs, The City of Huntington and Cabell County Commission, and MDL Track One Defendant Allergan Finance, LLC, hereby stipulate to the following regarding the authenticity of IQVIA data:

1. Plaintiffs in the MDL Track One cases, *In Re: National Prescription Opiate Litigation*, N.D. Ohio, Case No. 1:17-MD-2804, made discovery requests to the Defendants, including Allergan Finance, LLC, seeking documents and data from IQVIA.

2. Pursuant to a contract dated May 15, 2018, Allergan Finance, LLC purchased from IQVIA XPONENT and XPONENT PLANTRAK data related to prescriptions of opioids. The time period for XPONENT data was January 1997 to December 2007, and the time period for the XPONENT PLANTRAK data was January 2008 to April 2018.

3. Beginning on August 10, 2018, Allergan Finance, LLC, through counsel, produced the purchased data in the MDL Track One Cases.

Exhibit 7

4. ALLERGAN_MDL_02485011 and ALLERGAN_MDL_03281086 are files that Allergan obtained from IQVIA pursuant to the contract set out above and produced.

Dated: October 2, 2020

Respectfully submitted,

THE CITY OF HUNTINGTON

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